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8 Attorney for Plaintiff
9 ALL POINTS CAPITAL CORP., a New York
10 corporation
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALL POINTS CAPITAL CORP., a New
York Corporation.,

Plaintiff,

v.

ARCHITECTURAL METAL
PRODUCTS, INC., an Alaska corporation;
PACIFIC ROLLFORMING, LLC, an
Alaska limited liability company;
RIDGETOP HAWAII, INC., an Hawaiian
corporation; RIDGETOP ROOFING AND
GUTTER, INC., an Alaska corporation;
ROBERT OLLMAN, a citizen of the State
of Wisconsin; BORIS GOKHMAN, a
citizen of the State of Wisconsin; and
TODD BEASLEY, a citizen of the State of
Alaska.,

Defendants.

Case No.: C 08-04394 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

CURRENT Case Management Conference:

Date: March 19, 2009
Time: 3:30 P.M.
Judge: Courtroom 6
17th Floor
United States District Courthouse
450 Golden Gate Avenue
San Francisco, California

PROPOSED Case Management Conference:

Date: May 21, 2009

1 WHEREAS Plaintiff All Points Capital Corp., a New York corporation ("Plaintiff"), is
 2 represented by Arent Fox LLP, by attorneys in the New York and Los Angeles offices of the
 3 firm;

4 WHEREAS Defendants Architectural Metal Products, Inc., an Alaska corporation, Pacific
 5 Rollforming, LLC, an Alaska limited liability company, Ridgetop Hawaii, Inc., an Hawaiian
 6 corporation, Ridgetop Roofing and Gutter, Inc., an Alaska corporation, and Todd Beasley, a
 7 citizen of the State of Alaska (sometimes collectively referred to herein as the "Beasley
 8 Defendants") are represented by Frederick Phillips, an attorney whose office is in San Diego,
 9 California,

10 WHEREAS Defendant Boris Gokhman, a citizen of the State of Wisconsin is appearing
 11 Pro Se in this action ("Defendant Gokhman"),

12 WHEREAS Defendant Vladimir Shuk, a citizen of the State of Wisconsin is also
 13 appearing Pro Se. in this action ("Defendant Shuk"); and

14 WHEREAS the parties are continuing to negotiate a stipulated judgment, all of the parties
 15 have expressed a willingness to resolve this dispute by a stipulated judgment, and the parties
 16 desire additional time for their negotiations to proceed without the added expense of traveling to
 17 San Francisco for the joint case management conference currently set for March 19, 2009;

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1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the
2 Court, the case management conference shall be continued for approximately sixty days until
3 May __, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date
4 and time as may be convenient for the Court.

5 Dated: Arent Fox LLP

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7 By: DAVID G. BAYLES
8 Attorneys for Plaintiff
9 ALL POINTS CAPITAL CORP.

10 Dated: By: FREDERICK PHILLIPS, on behalf of
11 Architectural Metal Products,
12 Rollforming, LLC, Ridgeway Hawaii,
13 Inc., Ridgeway Roofing and Gutter, Inc.,
14 and Todd Beasley

15 Dated: 03/08/09

16 By: BORIS GOKHMAN, Pro Se

17 Dated: 3/8/09

18 By: VLADIMIR SHUK, Pro Se

[PROPOSED] ORDER

19 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing
20 therefore, the case management conference in the above-referenced action currently set for
21 March __, 2009, is hereby continued until May __, 2009, at 3:30 p.m. or _____ in
22 Courtroom 6 of the above-entitled Court.

23 **IT IS SO ORDERED.**

24 Dated: The Hon. Vaughn R. Walker
25 United States District Judge

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the
2 Court, the case management conference shall be continued for approximately sixty days until
3 May ___, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date
4 and time as may be convenient for the Court.

5 Dated: Attest Fox LLP

7 By: DAVID G. BAYLES
8 Attorneys for Plaintiff
ALL POINTS CAPITAL CORP.

Dated: 3-6-09
By: Fredrick Phillips
10 FREDERICK PHILLIPS, on behalf of
11 Architectural Metal Products,
12 Rollforming, LLC, Ridgetop Hawaii,
Inc., Ridgetop Roofing and Gutter, Inc.
and Todd Beasley

13 Dated: _____ By: _____
14 _____ BORIS GOKHMAN, *Pro Se*

5 Dated: _____ By: _____
VLADIMIR SHUK, Pro Se

[PROPOSED] ORDER

Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing therefore, the case management conference in the above-referenced action currently set for March ___, 2009, is hereby continued until May ___, 2009, at 3:30 p.m. or _____ in Courtroom 6 of the above-entitled Court.

IT IS SO ORDERED.

Dated:

**The Hon. Vaughn R. Walker
United States District Judge**

1 NOW THEREFORE, the parties stipulate and agree that, subject to the approval of the
2 Court, the case management conference shall be continued for approximately sixty days until
3 May 21, 2009, at 3:30 p.m. in Courtroom 6 of the above-entitled Court, or until such other date
4 and time as may be convenient for the Court.

5 Dated: 3/9/09

Arent Fox LLP

6 By: 
7 DAVID G. BAYLES
8 Attorneys for Plaintiff
9 ALL POINTS CAPITAL CORP.

10 Dated:

11 By: FREDERICK PHILLIPS, on behalf of
12 Architectural Metal Products,
13 Rollforming, LLC, Ridgetop Hawaii,
14 Inc., Ridgetop Roofing and Gutter, Inc.,
15 and Todd Beasley

16 Dated:

17 By: BORIS GOKHMAN, Pro Se

18 Dated:

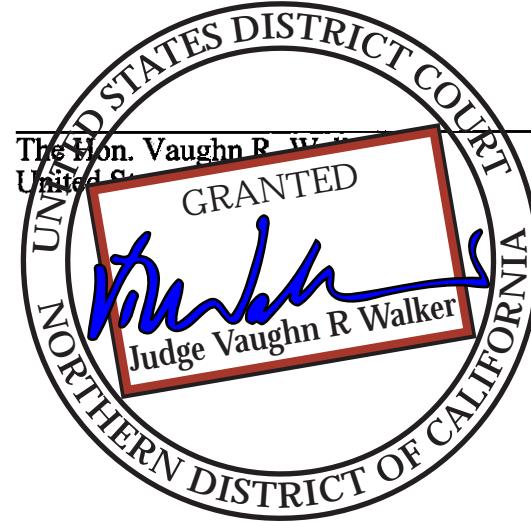
19 By: VLADIMIR SHUK, Pro Se

PROPOSED ORDER

20 Pursuant to the stipulation of the parties set forth above and GOOD CAUSE appearing
21 therefore, the case management conference in the above-referenced action currently set for
22 March 19, 2009, is hereby continued until May 21, 2009, at 3:30 p.m. or _____ in
23 Courtroom 6 of the above-entitled Court.

24 IT IS SO ORDERED.

25 Dated: 3/10/2009



**ALL POINTS CAPITAL V. ARCHITECTURAL METAL PRODUCTS
CASE NO.: C 08-04394 VRW
USDC, NORTHERN DISTRICT, SAN FRANCISCO
PROOF OF SERVICE**

I am a citizen of the United States. My business address is ARENT FOX LLP, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013. I am employed in the county of Los Angeles where this service occurs. I am over the age of 18 years, and not a party to the within cause.

On March 9, 2009, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all parties appearing on the docket sheet:

Stipulation and [Proposed] Order to Continue The Case Management Conference

(BY FAX) by transmitting via facsimile from facsimile number (213) 629-7401 the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m. A statement that this document was successfully transmitted without error is hereby attached to this Proof of Service.

(BY MAIL) I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the U.S. Postal Service, and that practice is that correspondence is deposited with the U.S. Postal Service the same day as the day of collection in the ordinary course of business. On this date, I placed the document(s) in envelopes addressed to the person(s) listed below, or as stated on the attached service list and sealed and placed the envelopes for collection and mailing following ordinary business practices.

(BY PERSONAL SERVICE) On this date, I delivered by hand envelope(s) containing the document(s) to the persons(s) listed below or as stated in the attached service list.

(BY OVERNIGHT DELIVERY) On this date, I placed the documents in envelope(s) addressed to the person(s) listed below or as stated on the attached service list, and caused those envelopes to be delivered to an overnight delivery carrier, with delivery fees provided for, for next-business-day delivery to whom it is to be served.

(BY ECF) I caused said documents to be transmitted using the Court's ECF system.

SEE ATTACHED SERVICE LIST

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under the penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on March 9, 2009, at Los Angeles, California.

Gladys Madrid

Frederick C. Phillips, Esq.
Phillips, Haskett & Ingwalson
701 "B" Street, Suite 1190
San Diego, CA 92101
Tel.: (619) 231-3737
Fax: (619) 233-1223

Vladimir Shuk in Pro Per
New Land
1840 North Farwell Avenue, #203
Milwaukee, WI 53202

Via U. S. Mail

Via ECF

Boris Gokhman in Pro Per
New Land
1840 North Farwell Avenue, #203
Milwaukee, WI 53202

Via U.S. Mail